

Serial No. 09/728,257
Reply to Office Action of July 29, 2005

REMARKS/ARGUMENTS

Claims 1-3, 5-11, 13, 14, 16 and 18-21 were presented for examination and are pending in this application. In an Official Office Action dated July 29, 2005, claims 1-3, 5-11, 13, 14, 16 and 18-21 were rejected. The Applicant thanks the Examiner for his consideration and examination of the claims and addresses the Examiner's comments concerning the claims pending in this application below.

Applicant herein amends claims 1, 10 and 16 and no new claims are presently added. Support for these amendments can generally be found on pages 5-6 and 15 of the specification. These changes are believed not to introduce new matter, and their entry is respectfully requested. In making this amendment, Applicant has not and does not narrow the scope of the protection to which the Applicant considers the claimed invention to be entitled and does not concede that the subject matter of such claims was in fact disclosed or taught by the cited prior art. Rather, Applicant reserves the right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and withdraw them.

I. 35 U.S.C. §112 First Paragraph Rejection of Claims

Claims 1-3, 5-11, 13, 14, 16 and 18 were rejected under 35 U.S.C. §112 First Paragraph as failing to comply with the enablement requirement. Specifically, the Examiner cites that the limitation recited in independent claims 1, 10 and 16 stating, "modifying the response to remove all of the identification information" is not described in the specification as to enable one skilled in the art to make and/or use the invention. The Examiner explains that the removal of all of the identification

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information is inconsistent with hiding the information to the external client as recited in the claims.

The Applicant, in this response, has amended independent claims 1, 10 and 16 to recite in varying language, "replace identification information for the computer device with information for the tunnel mechanism, whereby access to the computer device to obtain the response is hidden from the external client." Information of the internal computer device, is replaced with tunnel mechanism information so as to hide information pertaining to the internal computer device from external clients. The tunnel mechanism thus acts as an interface between the computer device and external client. The Applicant directs the Examiner to pages 5-6 and 15 of the specification for a detailed explanation.

Based on the aforementioned amendments and remarks, the Applicant submits that independent claims 1, 10 and 16 contain subject matter that is described in the specification in such a manner as to enable one skilled in the art to make and/or use the invention. Accordingly, the Applicant requests the rejections of claims 1, 10 and 16 and of claims 2-3, 6-9, 11, 13, 14 and 18, which depend from claims 1, 10 and 16, be withdrawn.

II. 35 U.S.C. §102 Anticipation Rejection of Claims

Claims 1-3, 5-6, 10-11, 13-14, 16 and 18 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,805,803 ("Birrell"). Applicant respectfully traverses these rejections in light of the following remarks.

MPEP §2131 provides:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegall Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed.

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Cir.1987). "The identical invention must be shown in as complete detail as contained in the claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

The claims, as currently amended, recite features lacking in the applied references. For example, independent claims 1, 10 and 16 recite in varying language, among other things, "replace identification information for the computer device with information for the tunnel mechanism...." Birrell fails to disclose such a limitation.

Birrell appears to disclose a method placing a firewall between the Internet and an intranet whereby public requests for intranet resources are made through a tunnel of the firewall so as to isolate the intranet from the Internet. See Birrell abstract. The Examiner asserts that Birrell discloses hiding identification information of a source located on the intranet from the requesting external client. The Applicant respectfully disagrees. As cited by the Examiner, Birrell discloses two mechanisms to handle requests for private resources. The first mechanism is to replace the HTTP connection with a HTTPS connection while having the redirected URL retain the original host name. Birrell Col. 5, lines 3-4. Clearly this option does not "hide" source identification information but merely secures the connection. The second mechanism disclosed by Birrell uses a redirected URL using the "host name of the private Web tunnel proxy server." Birrell continues to state, "In this case, the entire original URL is encoded in the remainder of the redirected URL." Birrell Col. 5, lines 7-9. Identification information of the source located within the intranet is not replaced but simply encoded. Thus the source information is still present in the URL.

As shown above, each and every element as set forth in claims 1, 10 and 16, are not expressly or inherently described by Birrell nor is the Applicant's invention as recited in claims 1, 10 and 16 shown in complete detail by Birrell.

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Accordingly, Birrell does not anticipate independent claims 1, 10 and 16. Withdrawal of the rejections is respectfully requested. Claims 2-3, 5-6, 11, 13-14, and 18 depend from claims 1, 10 and 16 and are, for at least the same reasons, not anticipated by Birrell. The Applicant respectfully requests reconsideration of the aforementioned claims.

III. 35 U.S.C. §103(a) Obviousness Rejection of Claims

Claims 7 and 19-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Birrell in view of U.S. Patent No. 5,913,922 (Dennis). Claim 8 was rejected as being unpatentable over Birrell in view of U.S. Patent No. 6,092,100 (Berstis). Claim 9 was rejected as being unpatentable over Birrell in view of U.S. Patent No. 6,351,817 (Flyntz). Claims 1-3, 5, 16 and 18 were rejected as being unpatentable over U.S. Patent No. 6,457,061 (Bal) and in further view of Lincoln D. Stein, "Web Security: A Step-by-Step Reference Guide," 1998 (Stein) and in further view of Flyntz. Claims 7 and 19-21 were rejected as being unpatentable over Bal in view of Stein and Flyntz and in further view of Dennis. Claim 8 was rejected as being unpatentable over Bal in view of Stein and in further view of Berstis. Finally, claim 9 was rejected as being unpatentable over Bal in view of Stein and in further view of Flyntz. In light of the following remarks, the Applicant respectfully traverses these rejections and respectfully request reconsideration.

MPEP §2143 provides:

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teaching. Second, there must be a reasonable

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expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

The cited references fail to teach or suggest all of the limitations recited in the claims as currently amended. With respect to the rejections of claims 7-9 as being unpatentable over Birrell, the Applicant submits that for the aforementioned reasons, Birrell does not teach or suggest all of the claim limitations. Specifically, Birrell does not teach or suggest replacing identification information for the computer device with information for the tunnel mechanism as recited in varying language in claims 1, 10 and 16. The Applicant takes notice that the Examiner has not identified this limitation as being taught or suggested in Dennis or Flyntz. The Applicant requests that the rejections be withdrawn.

Likewise, the Applicant traverses the Examiner's rejections of claims 1-3, 5, 7-9, 16 and 18 as being unpatentable over Bal in view of various combinations of Stein, Flyntz, Dennis and Berstis. The Examiner fails to assert that Bal, in view of any of the cited references, teaches or suggests the replacement of identification information of the source with identification information of the tunnel mechanism. If such a teaching exists, the Applicant requests that the Examiner specifically identify its location and its pertinence to the Applicant's invention.

With respect to claims 19-21, the Applicant asserts that the cited references fail to teach or suggest all of the cited limitations. For example, independent claim 19 recites, among other things, "without identification information for the internal device." Neither Berrill nor Bal teaches or suggests translating error messages, taking response to error messages or to include unresolved error messages "without identification information for the interior device." This limitation is also apparently not taught or suggested by Stein, Flyntz, Dennis or Berstis as the Examiner fails to cite such a teaching in his rejection of the claims.

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As all of the claim limitations of claim 19 are not taught or suggested by the cited references, the Applicant respectfully submits that claim 19 is patentable over Bal and over Berrill in view of Stein, Flyntz, Dennis and Berstis. Accordingly, the Applicant respectfully requests the rejections be withdrawn. Claims 20 and 21 depend from claim 19 and are, for at least the same reasons, patentable. Reconsideration is respectfully requested.

In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicant's attorney at the telephone number listed below.

No fee is believed due for this submittal. However, any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

October 17, 2005

Respectfully submitted,


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